

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION
CIVIL ACTION NO: 21-cv-

Lee Andrew Jackson,)	
)	
Plaintiff,)	
vs.)	PETITION AND NOTICE OF REMOVAL
)	
Gilsimar Souza and Gil Souza Trans)	
Corp.)	
)	
Defendants.)	

**TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, ANDERSON DIVISION:**

Pursuant to Title 28, U.S.C.A., § 1441(a), the Defendants Gilsimar Souza and Gil Souza Trans Corp hereby removes this action to the United States District Court, District of South Carolina, upon the following grounds:

1. These Defendants are the only named Defendants in the Complaint in a civil action filed on January 11, 2021, by Plaintiff Lee Andrew Jackson, in the Court of Common Pleas for the County of Anderson, South Carolina, Civil Action No. 2021-CP-04-00050.

2. The Defendants received notice of the Summons and Complaint on January 26, 2021 and January 27, 2021, by way of personal service as to Gilsimar Souza and by Certified Mail as to Gil Souza Trans Corp. A copy of the Summons and Complaint is attached hereto as Exhibit "A".

3. Other than the above-referenced Summons and Complaint, no other pleadings have been filed in this action, to the best of Defendants' knowledge.

4. This Court has original jurisdiction over this civil action, which is presently pending in the Anderson County Common Pleas Court, pursuant to 28 U.S.C. § 1332, and this action is one that may be removed to this Court by the Defendants pursuant to the provisions of 28 U.S.C. § 1441(a). The Plaintiff herein is a citizen and resident of the State of Florida, Defendant Gil Souza Trans Corp is a corporation organized and existing pursuant to the laws of the State of New Jersey, Defendant Gilsimar Souza is a citizen and resident of the state of New Jersey. Additionally, counsel for the Plaintiff has represented to counsel for the Defendant that the amount in controversy exceeds \$75,000.00, exclusive of interest and costs. This court has jurisdiction based upon diversity of citizenship.

WHEREFORE, the Defendants respectfully requests this Court to accept this Notice of Removal, to cause this entire suit to be docketed in this Court, and to proceed to the final determination of this suit.

AIKEN BRIDGES ELLIOTT TYLER &
SALEEBY, P. A.

By: s/James M. Saleeby, Jr.

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January 8, 2021